

FLEISCHMAN BONNER & ROCCO  
ATTORNEYS AT LAW LLP

81 MAIN STREET • SUITE 515 • WHITE PLAINS • NEW YORK • 10601  
TEL: 914.278.5100 • FAX: 917.591.5245 • WEB: [WWW.FBRLLP.COM](http://WWW.FBRLLP.COM)

EMAIL: [sdavies@fbrllp.com](mailto:sdavies@fbrllp.com)

March 11, 2024

**VIA ECF**

Hon. George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *In re Terrorist Attacks on September 11, 2001, 1:03-md-1570 (GBD/SN)*  
*Hugh A. Chairnoff, et al. v. Islamic Republic of Iran, 1:18-cv-12370 (GBD/SN)***

Dear Judge Daniels:

We are counsel for the Plaintiff Jamie K. Hawkins in the above-captioned *Hugh A. Chairnoff, et al. v. Islamic Republic of Iran*, 1:18-cv-12370 and the related MDL. We write to respectfully request the Court to reconsider the order issued today (MDL ECF No. 9626) declining to enter the proposed form of judgment submitted on February 22, 2024 as MDL ECF No. 9590.

The Court's March 22, 2023 memorandum decision and order granting Ms. Hawkins's motion for default judgment against Iran and awarding her \$8,500,000 in solatium damages (MDL ECF No. 8947) did not include a direction to the Clerk of Court to enter judgment in Ms. Hawkins's favor, nor did it liquidate the amount of pre-judgment interest awarded to her. We have been informed by the Orders and Judgments Unit that the Clerk of Court cannot enter judgment absent a specific directive from the Court.

Wherefore, we respectfully request the Court to enter the proposed form of judgment submitted MDL ECF No. 9590, a copy of which is annexed hereto, or to direct the Clerk of Court to enter judgment consistent with the March 22, 2023 decision and order.

Respectfully submitted,

/s/ Susan M. Davies

Susan M. Davies

Attachment